



Amendments to the Drawings:

FIG. 2 is hereby amended to add call out "200" that is mentioned in the text but was inadvertently omitted from the drawing. FIG. 2 is also amended to designate more clearly "packet network 210." Previously, there were two "packet network 210" labels in FIG. 2. The packet networks are hereby amended to read "packet network 210a" and "packet network 210b."

FIG. 5 is hereby amended to designate more clearly "packet network 210" as "packet network 210a."

FIG. 8 is likewise amended to designate more clearly "packet network 210a" and "packet network 210b" and in order to be consistent with FIG.'s 2 and 5.

REMARKS

The above-identified patent application has been reviewed in light of the Examiner's Action dated December 1, 2005 ("the Office Action"), a petition for a two-months' extension of time being transmitted herewith. In the Office Action, the Examiner rejected Claims 23 – 35 and 60 – 70 as being indefinite under 35 USC §112, first paragraph; Claim 1, 21, 36 – 38, 58, 73 and 74 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Number 6,600,812 to Gentillin *et al.*; Claims 2 – 20, 22, 39 – 57 and 59 as being obvious over U.S. Patent Number 6,600,812 to Gentillin *et al.*; and Claims 23 – 35 and 60 - 72 under 35 U.S.C. §103(a) as being obvious over U.S. Patent Number 6,600,812 to Gentillin *et al.* in view of U.S. Patent Number 6,771,742 to McCalmont *et al.* In response, Applicants make the above amendments and the following remarks.

For purposes of clarity, and without intending to abandon or to dedicate to the public any patentable subject matter, Claims 27 – 32, 47, 55, 58, 59 and 70 - 74 are hereby cancelled. Claims 1 – 8, 11 – 17, 19, 20, 23 – 26, 38 – 40, 46, 60 – 62, 65, 66, 68 and 69 are hereby amended. Therefore, **Claims 1 – 26, 33 – 46, 48 - 54, 56 – 57, and 60 - 69 are currently pending.** As set forth more fully below, reconsideration and allowance of the pending claims are respectfully requested.

I. AMENDMENTS TO THE DRAWINGS AND SPECIFICATION

FIG. 2 is hereby amended to provide a call out (200) that was inadvertently omitted from the drawings submitted with the application. Paragraph [0043] is hereby amended to correct a reference to FIG. 2, which was inadvertently written "FIG. 2A."

The other amendments to the drawings and to the specification are related and therefore discussed together. FIG.'s 2, 5 and 8 are hereby amended to change the call out number on "packet network 210" to "packet network 210a" and "packet network 210b." This amendment is to eliminate any possible confusion whether "packet network 210" is one network (with two instances in the figures) or two networks (with improper call out numbers in the figures).

These amendments show that packet network 210a and packet network 210b may be the same network, may be two subsections of the same network or may be two different networks. These amendments are not new matter because all three possibilities are support by the drawings, specification and claims as originally filed.

The drawing specification and claims as filed support the proposition that packet network 210 may be the same network or two subsections of the same network. Claim 25, for example, states that "...the identified emergency services responds to the queries by transmitting information corresponding with the retrieval key to the CES." (emphasis added). Thus, the emergency services have to be connected to the same packet network, or to two parts of the same packet network, as the CES for such communication to take place.

The proposition that packet network 210 may be separate networks is supported by the drawings as filed, because packet network 210 is illustrated in FIG.'s 2 and 8 as two separate networks. Furthermore, packet network 210 on the left side of these figures is illustrated as being within emergency service network 220, which indicates that the packet network 210 inside of emergency service network 220 may be separate from packet network 210 outside of emergency service network 220. In paragraph [0043], applicants state that "... emergency services 231-233 may be connected to response gateways 221-223 over a network other than a packet network." This statement implies that packet network 210 in emergency services network 220 may be separate from packet network 210 and may, in fact, not be a packet network at all.

Furthermore, claim 24 supports two packet network in that "...the identified emergency services responds to the queries by transmitting information corresponding with the retrieval key to the one response gateway; and the one response gateway transmits the information to the CES...." This claim implies two packet networks that require a response gateway to forward information from one packet network to another. Thus, no new matter is introduced.

The amendments to the specification are to conform the description to the drawings.

II. AMENDMENTS TO THE CLAIMS

112 REJECTIONS

Claims 23 – 35 and 60 – 70 stand rejected as being indefinite under 35 USC §112, first paragraph because “SNR” is not defined in the claims. By this amendment, claims 23 and 60 are amended to include “a service/name resolution (SNR) system” to remedy the claims’ definitional ambiguity.

ART REJECTIONS

Claims 1, 21, 36 – 38, 58, 73 and 74 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Number 6,600,812 to Gentillin *et al.* (herein “Gentillin”).

By the above amendment, claims 73 and 74 are canceled. Of the remaining claims, claims 1 and 38 are independent. The rest of the above-listed claims depend directly or indirectly from claims 1 or 38. Applicants will first discuss the independent claims.

In order for a rejection under 35 U.S.C. §102 to be proper, each and every element as set forth in a claim must be found, either expressly or inherently described, in a single prior art reference. (MPEP §2131). In this application, however, each and every element of the rejected claims cannot be found in the cited reference. Specifically, *Gentillin* does not disclose or suggest:

a plurality of response gateways connected to the emergency services and connected to the packet network; and

a plurality of conforming emergency systems (CES) connected to the packet network, each of the conforming emergency systems is configured to establish a media channel with one of the plurality of response gateways...

Claim 1, lines 7 – 11. The CES equivalents in *Gentillin* (PSAP Operator Terminals 110) are not connected to a packet network. Because they are not connected to a packet network, they do not need to be configured to establish a media channel to one of a plurality of response gateways; *Gentillin*’s PSAP Operator Terminals 110 are directly connected to local redundant data store/PSAP server 100. Establishing a media

channel is superfluous in *Gentillin*'s directly connected system. For this reason alone, Applicants' invention, as claimed, distinguishes over the prior art.

Furthermore, *Gentillin* does not disclose or suggest Applicant's plurality of response gateways. The Examiner analogizes *Gentillin*'s blocks 200 and 100 to Applicants' response gateways 221, 222 and 223. It is respectfully pointed out, however, that *Gentillin*'s block 100 is described as a "local redundant data store/PSAP server" and block 200 is described as an "authoritative data store." These blocks are described in Col. 5 as storing data or copies of the data. In contrast, Applicants' response gateways receive and forward information requests to emergency services (among other functions) responsive to setting up a media channel and responsive to receiving a retrieval key. Applicants' response gateways do not store data *per se*. For the foregoing reasons, reconsideration and allowance of at least Claim 1 is respectfully requested.

Independent Claim 38 is likewise not anticipated by *Gentillin* for many of the same reasons. For example, Claim 38 includes the limitations:

in each of the conforming emergency systems, establishing a media channel with one of the response gateways;
in one of the conforming emergency systems (CES), responsive to establishing a media channel with one of the response gateways over the packet network and responsive to an emergency event, transmitting a retrieval key over the media channel to the one response gateway;

Claim 38, lines 7 – 12. There is no establishing of a media channel over a packet network in *Gentillin*. There is also no transmitting of a retrieval key responsive to establishing a media channel and responsive to an emergency event in *Gentillin*. Thus, Applicants' independent claim 38 is not anticipated by *Gentillin*.

Claims 21, 36 and 37 depend from allowable independent claim 1 and are therefore allowable. For the foregoing reasons, Applicants' claimed invention is not anticipated by *Gentillin*. Withdrawal of this rejection and allowance of these claims is respectfully requested.

Claims 2 – 20, 22, 39 – 57 and 59 stand rejected under 35 U.S.C. §103(a) as being obvious over *Gentillin*. In this claim group, Claims 47, 55 and 59 have been

cancelled. Claims 2 – 20 and 22 depend from allowable claim 1 and are therefore allowable. Claims 39 – 54 and 56 – 57 depend from allowable claim 38 and are therefore allowable. However, each of these groups includes subject matter that is independently patentable.

By way of example (and not limitation), claims 6 and 53 include a limitation wherein each response gateway is configured to negotiate parameters of the media channel. Applicants can find no such negotiation in *Gentillin*. Further, claims 7 and 44 include a limitation to a channel setup system that facilitates setting up a channel between a CES and a response gateway. There is no teaching or suggestion of a channel setup system in *Gentillin*, because, as discussed above, there is no channel needed in the hard-wired system of *Gentillin*.

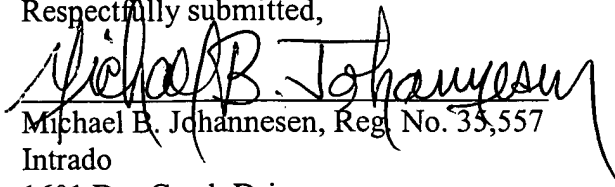
Additionally, claims 13 and 54 include a limitation that each response gateway is configured to initiate communication with the CES by transmitting a request for a media channel into the packet network. *Gentillin* does not teach or suggest initiation of upstream communications. Thus many of the dependent claims individually include limitations to subject matter not taught or suggested by *Gentillin* and are therefore patentable. For the foregoing reasons, withdrawal of this rejection and allowance of these claims is respectfully requested.

Claims 23 – 35 and 60 – 72 stand rejected under 35 U.S.C. §103(a) as being obvious over *Gentillin* in view of U.S. Patent Number 6,771,742 to McCalmont *et al.* (herein “*McCalmont*”). In this claim group, Claims 27 – 32 and 70 – 72 were cancelled. Claims 23 – 26 depend from allowable independent Claim 1 and are therefore allowable. Claims 60 – 69 depend from allowable independent Claim 38 and are therefore allowable. Withdrawal of this rejection and allowance of these claims is respectfully requested.

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The application now appearing to be in form for allowance, early notification of same is respectfully requested. The Examiner is invited to contact the undersigned by telephone if doing so would expedite the resolution of this case.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael B. Johannesen", is written over a horizontal line.

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